

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**PSARA ENERGY, LTD.**

**Plaintiff**

**SPACE SHIPPING, LTD.; GEDEN HOLDINGS:  
LTD.; ADVANTAGE ARROW SHIPPING,  
LLC; GENEL DENIZCILIK NAKLIYATI A.S.  
A/K/A GEDEN LINES; ADVANTAGE  
TANKERS, LLC; ADVANTAGE HOLDINGS,  
LLC; FORWARD HOLDINGS, LLC;  
MEHMET EMIN KARAMEHMET;  
GULSUN NAZLI KARAMEHMET -  
WILLIAMS; and TUĞRUL TOKGÖZ**

**Defendants**

**No. 1:18-cv-00178**

**ADMIRALTY**

**PLAINTIFF’S RESPONSE TO ADVANTAGE DEFENDANTS’ MOTION TO DEEM  
THEIR NOTICE REGARDING THE ARBITRAL TRIBUNAL’S MAJORITY AWARD  
ON COSTS TO HAVE BEEN TIMELY FILED**

Plaintiff opposes and respectfully requests the Court to deny the Advantage Defendants’ Motion to Deem their Notice Regarding the Arbitral Tribunal’s Majority Award on Costs to Have Been Timely Filed (Doc. 68). The objective of Defendants’ Motion continues to be the Court’s indulgence to file an impermissible motion disguised as a “notice.” This was adequately addressed in Plaintiff’s Motion to Strike (Doc. 63) and Plaintiff’s Reply (Doc. 66). Plaintiff incorporates by reference the respective arguments thereof.

The Court already has before it: the Tribunal’s Majority Award on Costs (Doc. 63-1); the reasons therefor (Doc. 62-2); and the Tribunal’s response and clarifications on the meaning of what the Tribunal meant in its order dated April 28, 2020 (Doc. 63-6). Plaintiff respectfully asserts that there is nothing further the Court needs from either of the parties in order to decide the various motions that relate to the London arbitration proceedings and are pending before the Court.

Plaintiff's counsel conferred as required by the Court's local rules and advised Defendants' counsel in advance of the motion opposed hereunder that they had no objection to Defendants' putting before the Court the Arbitral Tribunal's Majority Award on Costs as issued by the Tribunal, and subsequently clarified and explained by the Tribunal. However, Defendants insist that the Court accept their filing of a notice that contains their arguments, interpretations, commentaries and advocacy.

For the reasons set out and supported with reference to legal authority in Plaintiff's Motion to Strike (Doc. 63) and Plaintiff's Reply referring to same (Doc. 66) Plaintiff respectfully requests the Court to deny Defendants' Motion.

Respectfully submitted,

GAITAS & CHALOS, P.C.

By: /s/George A. Gaitas  
George A. Gaitas  
State Bar No. 24058885  
Federal Bar No. 705176  
Jonathan M. Chalos  
State Bar No. 24097482  
Federal Bar No. 3008683  
1908 N. Memorial Way  
Houston, Texas 77007  
Telephone: 281-501-1800  
Fax: 832-962-8178  
E-mail: [gaitas@gkclaw.com](mailto:gaitas@gkclaw.com)  
[chalos@gkclaw.com](mailto:chalos@gkclaw.com)

*Attorneys for Plaintiff*  
Psara Energy, Ltd.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2020, I electronically filed the foregoing Response with the Clerk of the Court using the cm/ECF system, which will send notification of such filing to all attorneys of record at their email addresses on file with the Court.

/s/George A. Gaitas  
George A. Gaitas